

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Magistrate No. 25-1096

v.

DONALD WILSON

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Marc Wilner, being first duly sworn, deposes and states that he is a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, & Explosives (“ATF”), and charges as follows:

I. PURPOSE OF THIS AFFIDAVIT AND BACKGROUND OF SPECIAL AGENT WILNER

1. This Affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint that on or about June 11, 2025, in the Western District of Pennsylvania, Donald WILSON (“WILSON”), the defendant, did violate laws of the United States. Specifically, WILSON, a convicted felon, possessed a firearm in violation of Title 18, United States Code Section 922(g)(1).

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, & Explosives (“ATF”) and have been so employed since 2015. Prior to my employment with the ATF, I was employed as a Probation Officer with the Allegheny County Court of Common Pleas from 2008 to 2015. For over six (6) of those years, I served with the High Impact Unit of the Probation Office. This specialized unit dealt with probationers and parolees who had a high risk of recidivism, such as drug dealers, violent offenders and gang members. I worked closely with the Pittsburgh Police Intelligence Unit (which tracked gang activity within the city of Pittsburgh) and

the Allegheny County Sheriff's Office Fugitive Unit. I participated in numerous searches during my time with the Probation Office and many of them resulted in the seizure of guns and drugs. I am currently assigned to the Pittsburgh Field Office of the ATF.

3. I received extensive training at the Department of Homeland Security Criminal Investigative Training Program and the Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Basic Training at the Federal Law Enforcement Training Center. This training lasted for over six (6) months and covered topics including federal criminal statutes, interviewing and interrogation techniques, arrest procedures, search and seizure, narcotics, undercover techniques, search warrant applications, and various other investigative techniques.

4. Throughout my career as an ATF Special Agent, I have been the affiant on over a hundred arrest warrants and or search warrants to include search warrants for, residences, vehicles, person, electronic devices, social media accounts, etc. I have also been a Case Agent and or Co-Case Agent in cases involving the illegal trafficking of firearms and narcotics, crimes of violence to include robbery, homicide and cases involving criminal groups and or gangs.

II. PROBABLE CAUSE

5. On June 11, 2025, Pittsburgh Bureau of Police (PBP) detectives executed a state search warrant at a residence on Harlow Street in the City of Pittsburgh. PBP SWAT deployed to secure the residence for the search warrant. WILSON was known to reside at this residence, and PBP investigators had seen him in and out of the residence in the hours leading up to the execution of the search warrant.

6. When SWAT deployed to execute the warrants, a PBP SWAT Operator observed WILSON sitting in a camping chair in the garage (the garage door was open). WILSON got up

and ran, but when a SWAT Operator deployed a flash-bang device, WILSON fell to the ground and was detained.

7. During the execution of the warrant, a is Glock, Model: 26, 9mm, SN:BWHV596 (was recovered from WILSON's immediate vicinity. It should be noted that the firearm was recovered from a cup holder in the folding chair in which WILSON was sitting when SWAT arrived and deployed.



8. The firearm was registered to WILSON's paramour, who will be referred to herein as Jane DOE to maintain her privacy because she is not currently charged with a criminal offense. DOE was asleep on a couch two floors above the garage at the time PBP SWAT deployed, and was awoken by the flash-bang device.

9. I am aware that WILSON's criminal history includes convictions for Carrying a Firearm Without A License, on or about July 3, 2013, Receiving Stolen Property, Person Not To

Possess A Firearm, Manufacture/Possession With Intent To Distribute, on or about October 16, 2013 Allegheny County Court of Common Pleas. I am aware that these are offenses punishable by more than one year of incarceration, and WILSON so knew because he was sentenced to serve more than a year of incarceration. As a result, he is prohibited from possessing a firearm under 18 U.S.C. § 922(g)(1). I am also aware that there are no major firearms or ammunition manufacturers within the Commonwealth of Pennsylvania.

10. I am also aware based upon my training and experience, as well as consultation with an ATF Interstate Nexus Expert, that Glock firearms are manufactured outside of Pennsylvania and therefore, the recovered Glock, Model: 26, .9mm, SN:BWHV596 must have traveled via interstate or foreign commerce to arrive at the location where the firearm was recovered.

13. WHEREFORE, I respectfully request that WILSON, be charged with violations of 18 U.S.C § 922(g)(1), felon in possession with a firearm, on or about June 11, 2025, in the Western District of Pennsylvania relative to the Glock, Model: 26, .9mm, SN:BWHV596

The above information is true and correct to the best of my knowledge, information, and belief.

/s/ Marc R. Wilner

MARC R. WILNER

Special Agent

Bureau of Alcohol, Tobacco,
Firearms, and Explosives.

Sworn and subscribed before me,
by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A),
this 17th day of June 2025

HONORABLE KEZIA O. L. TAYLOR

United States Magistrate Judge
Western District of Pennsylvania